

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736  
Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001  
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0185  
Comment submitted by Rena I. Steinzor, Professor of Law, University of Maryland School of Law, President for Progressive Reform and Yee Huang. J.D. L.L.M. Policy Analyst, Center for Progressive Reform (CPR)

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## Submitter Information

**Submitter's Representative:** Yee Huang, Policy Analyst  
**Organization:** Center for Progressive Reform (CPR)

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## General Comment

The Center for Progressive Reform (CPR) is a 501(c)(3) nonprofit research and educational organization with a network of Member Scholars who work to protect human health and safety and the environment through analysis and commentary.

The establishment of the Bay TMDL marks a tremendous turning point in restoring the Chesapeake Bay by capping the total amount of discharged pollutants. To ensure that state allocations and the overall Bay TMDL are met, EPA has established a new accountability framework that represents the first real opportunity to hold the Bay jurisdictions accountable for their promises to reduce pollution and clean up the Bay. States will play a key role in achieving the Bay TMDL, and states that fail to contribute or fail to provide an equally powerful alternative are undermining the overall goals that several generations of governors have endorsed.

Please see attached files for CPR's comments on the Bay jurisdictions' draft Phase I Watershed Implementation Plans as they relate to achieving the Bay TMDL.

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## Attachments

- EPA-R03-OW-2010-0736-0185.1:** Comment attachment submitted by Rena I. Steinzor, Professor of Law, University of Maryland School of Law, President for Progressive Reform and Yee Huang. J.D. L.L.M. Policy Analyst, Center for Progressive Reform (CPR)
- EPA-R03-OW-2010-0736-0185.2:** Comment attachment submitted by Rena I. Steinzor, Professor of Law, University of Maryland School of Law,

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**EPA-R03-OW-2010-0736-0185.3:** Comment attachment submitted by Rena I. Steinzor,  
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